

LAW OFFICE OF  
RICHARD E. SIGNORELLI  
799 Broadway, Suite 539  
New York, NY 10003  
Telephone: 212 254 4218  
Facsimile: 212 254 1396  
rsignorelli@nycLITIGATOR.com<sup>SM</sup>  
www.nycLITIGATOR.com<sup>SM</sup>  
*Attorneys for the Defendants identified on  
Exhibit 1 to the Notice of Motion submitted herewith*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	
SECURITIES INVESTOR PROTECTION	:
CORPORATION,	: Adv. Pro. No. 08-01789 (SMB)
	:
Plaintiff-Applicant,	: SIPA LIQUIDATION
	:
v.	: (Substantively Consolidated)
	:
BERNARD L. MADOFF INVESTMENT	:
SECURITIES LLC,	:
	:
Defendant.	:
-----X	
In re:	:
	:
BERNARD L. MADOFF,	:
	:
Debtor.	:
-----X	
IRVING PICARD, Trustee for the Liquidation	:
of Bernard L. Madoff Investment Securities LLC,	: Adv. Pro. No. 10-5394 (SMB)
	:
Plaintiff,	:
	: <b>DECLARATION OF</b>
v.	: <b><u>BRYAN HA</u></b>
	:
RICHARD M. GLANTZ, et al.,	:
	:
Defendants.	:
-----X	

BRYAN HA hereby declares under penalty of perjury, pursuant to 28 U.S.C. §

1746, that the following are true and correct:

1. I am associated with the Law Office of Richard E. Signorelli, attorneys for the defendants in the above-captioned action. As such, I am fully familiar with the facts and circumstances of this matter.

2. I respectfully submit this declaration in support of defendants' motion to dismiss the Amended Complaint pursuant to Rules 8(a), 9(b), 12(b)(1), 12(b)(2) and (6) of the Federal Rules of Civil Procedure and Rules 7009 and 7012(b) of the Federal Rules of Bankruptcy Procedure or, alternatively, for a stay of this action pursuant to 11 U.S.C. § 105.

3. Attached hereto as Exhibit A is a true and correct copy of the Amended Complaint filed in this action on January 9, 2015.

4. Attached hereto as Exhibit B is a true and correct copy of a page from the Trustee's website captured on April 13, 2015 showing, inter alia, that the total value of the customer claims allowed as of April 10, 2015, is \$13.568 billion.

5. Attached hereto as Exhibit C is a true and correct copy of a page from the Trustee's website captured on April 13, 2015 showing, inter alia, that the Trustee has recovered (and will be recovering pursuant to settlement agreements that he has entered into) approximately \$10.571 billion for the customer property fund.

6. Attached hereto as Exhibit D is a true and correct copy of a document dated January 7, 2014, entitled "Trustee's Motion For Entry Of Order Pursuant To Section 105(a) Of The Bankruptcy Code And Rules 2002 And 9019 Of The Federal Rules Of Bankruptcy Procedure Approving Settlement Of Common Law Claims By And Between The Trustee, The Class Representatives, And JPMorgan".

7. Attached hereto as Exhibit E is a true and correct copy of the United

States Department of Justice's "Petition Form DIR" for the Madoff Victim Fund.

8. Attached hereto as Exhibit F is a true and correct copy of a page from the New York State Department of State Division of Corporations website captured on March 16, 2015, showing the entity status information for Bernard L. Madoff Investment Securities LLC.

Dated: New York, New York  
May 1, 2015

/s/ Bryan Ha  
Bryan Ha